

Plan For North Calciner 1 NOx Monitoring

1. Manufacturing Order Documents (MODs) will be updated to have all affected copper chromium production campaigns divided into segments of 5 tote lots of dried powder for the duration of a campaign. A campaign could have multiple lots depending on Process Order quantity.
2. General Change Requests (GCRs) will be issued to have QA/AC change SAP Material Master setup to have the dried lots go into Quality Inspection (QI) status for all affected products. The GCRs will also include adding new Specifications to LabVantage with nitrates as the required analysis.
3. QA/QC will test the lots for nitrates against the new Specification. If results are below 2.0 % the material will move from QI to Available status. If results are above 2.0% the material will remain in QI status and the data will be further analyzed and a TDR issued as needed with a detailed plan on feed order to North Calciner 1 to ensure NOx levels will remain below 10lbs/day.
4. The North Calciner 1 maximum feed screw setting will be limited in the controls logic on a campaign basis to ensure calcination rates will not exceed rates required to keep NOx levels below 10 lbs/day.
5. All pertinent data including nitrates analysis and calciner rates will be tracked in spreadsheet.